

1 NICHOLAS TRUTANICH
2 Attorney for the United States
3 Acting Under the Authority Conferred
4 By Title 28, United States Code, Section 515
5 Robert Krief
6 Assistant United States Attorney
7 501 Las Vegas Boulevard South, Suite 1100
8 Las Vegas, Nevada 89101
9 Tel.: (702) 388-6336
10 Robert.Krief@usdoj.gov
11 *Attorneys for the Plaintiff*

12 LAW OFFICE OF TELIA U. WILLIAMS
13 Telia U. Williams, Esq.
14 10161 Park Run Drive, Suite 150
15 Las Vegas, Nevada 89145
16 Tel.: (702) 835-6866
17 telia@telialaw.com
18 *Attorney for the Defendant,*
19 *Kary Watson*

20
21 **UNITED STATES DISTRICT COURT**

22 **DISTRICT OF NEVADA**

23 UNITED STATES OF AMERICA,

24 Case No. 2:17-cr-00124-JAD-EJY

25 Plaintiff,

**STIPULATION AND ORDER TO
CONTINUE SENTENCING**

26 vs.

(THIRD REQUEST)

27 KARY WATSON,

28 Defendant.

ECF No. 481

29
30 IT IS HEREBY STIPULATED AND AGREED by and between Telia U. Williams, Esq.,
31 counsel for the defendant, Kary Watson, and Robert Krief, Esq., Assistant United States
32 Attorney, counsel for the Government, that the Sentencing currently scheduled for July 13, 2020,
33 at 3:00pm, be vacated and reset to a time no sooner than 120 days from July 13, 2020.

34
35 This Stipulation is entered into for the following reasons:

36
37 1. The defendant, Kary Watson, and his counsel, require additional time to await the
38 outcome and reasoning of the *United States v. Figueroa-Beltran*, No. 16-10388, *8

1 (D.C. No. 2:15-cr-00176-KJD-GWF) (Order Certifying Question to Nevada
2 Supreme Court.)

3 2. Mr. Watson and his counsel have conferred and believe that the outcome of the
4 aforementioned case will be critical to making appropriate sentencing argument,
5 and deciding which applicable favorable sentencing factors to focus on to
6 potentially mitigate punishment.

7 3. Counsel for the Government agrees that awaiting the decision in the Nevada
8 Supreme Court case is worthwhile, and has no objection to this continuance.

9 4. The defendant is in custody, but does not object to a continuance.

10 5. Denial of this request for continuance could result in a miscarriage of justice.

11 6. For all the above-stated reasons, the ends of justice would best be served by a
12 continuance of the sentencing for one hundred twenty (120) days.

13 7. This is the third request for a continuance.

14 DATED: July 6, 2020

15 LAW OFFICE OF TELIA U. WILLIAMS

16 By: /s/ Telia U. Williams

17 Telia U. Williams, Esq.
18 10161 Park Run Drive, Suite 150
19 Las Vegas, Nevada 89145
20 Tel.: (702) 835-6866
telia@telialaw.com

21 *Attorney for Defendant,
Kary Watson*

NICHOLAS TRUTANICH
UNITED STATES ATTORNEY

By: /s/ Robert Knief

Robert Knief, Esq.
Assistant United States Attorney
501 Las Vegas Boulevard South, Suite 1100
Las Vegas, Nevada 89106
Tel.: (702) 388-6336

*Attorney for Plaintiff,
United States*

NICHOLAS TRUTANICH
Attorney for the United States
Acting Under the Authority Conferred
By Title 28, United States Code, Section 515
Robert Knief
Assistant United States Attorney
United States Attorney's Office
501 Las Vegas Blvd. South, Suite 1100
Las Vegas, Nevada 89101
Tel: (702) 388-6336
Robert.Knief@usdoj.gov
Attorney for United States

LAW OFFICE OF TELIA U. WILLIAMS
Telia U. Williams, Esq.
10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145
Tel.: (702) 835-6866
telia@telialaw.com
*Attorney for the Defendant,
Kary Watson*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Case No. 2:17-cr-00124-JAD-EJY

ORDER

Plaintiff,

vs.

KARY WATSON,

Defendant.

FINDINGS OF FACT

Based on the Stipulation of counsel, and good cause appearing therefore, the court finds that the Stipulation by, between, and among the United States, and defendant Kary Watson, is entered into for the following reasons:

1. The defendant, Kary Watson, and his counsel, require additional time to await the outcome and reasoning of the *United States v. Figueroa-Beltran*, No. 16-

10388, *8 (D.C. No. 2:15-cr-00176-KJD-GWF) (Order Certifying Question to
2 Nevada Supreme Court.)

3 2. Mr. Watson and his counsel have conferred and believe that the outcome of the
4 aforementioned case will be critical to their making appropriate sentencing
5 argument, and deciding which applicable favorable sentencing factors to focus
6 on to potentially mitigate punishment.

7 3. Counsel for the Government agrees that awaiting the decision in the Nevada
8 Supreme Court case is worthwhile, and has no objection to this continuance.

9 4. The defendant is in custody, but does not object to a continuance.

10 5. Denial of this request for continuance could result in a miscarriage of justice.

11 6. For all the above-stated reasons, the ends of justice would best be served by a
12 continuance of the sentencing hearing.

13 7. This is the third request for a continuance.

14
15 **CONCLUSIONS OF LAW**

16 Denial of this request for continuance would deny the defendant, Kary Watson, the
17 opportunity to consider, with his counsel, appropriate factors to weigh in his sentencing
18 argument, and/or to consider additional favorable factors for his sentencing.

19 As such, denial of this request for continuance could result in a miscarriage of justice.

20
21 **ORDER**

22 IT IS HEREBY ORDERED that the sentencing currently scheduled for July 13, 2020
23 at 3:00pm, be continued to November 9, 2020, at 2:00 p.m.

24
25 DATED this 9th day of July, 2020.

26
27
28 
UNITED STATES DISTRICT JUDGE